

03.01-09/30/97-00298



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

Certified Mail
Return Receipt Requested

SEP 30 1997

Mr. James F. Harris
Commander Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street
Norfolk, VA 23511-2699

Ref: Final Administrative Order on Consent
U.S. EPA Docket No. RCRA-III-038CA

Subject: Additional Comments on the Amended Project Plans Sampling for the Phase III
RCRA Facility Investigation RCRA Facility Investigation (RFI) For the Naval
Air Station Oceana, Virginia Beach, Virginia (July 1997)

The United States Environmental Protection Agency (EPA) Region III Office has received the Contract Regional Laboratory (CRL) comments on the Amended Project Plans Sampling for the Phase III RCRA Facility Investigation (RFI) (July 1997) (sampling plan). Receipt of these CRL comments completes EPA's review of this sampling work plan. Based on the review conducted by Ms. Diann Sims, Regional Quality Assurance Manager, Quality Assurance Team, CRL, EPA Region III is providing the additional comments below. These comments must be addressed by the Department of Navy in accordance with Paragraph F.14. of the Final Administrative Order on Consent. Final approval of the sampling work plan will be granted upon the Department of Navy's response to the comments provided in this letter and the September 26, 1997 letter. As stated in the September 26, 1997 letter, in an effort to meet the proposed October 1997 mobilization schedule as proposed by the Department of Navy, please submit a response to both these sets of comments within the next week following the Department of Navy's receipt of this letter.

CRL Comments on the Sampling Plan

1. It is not clear if the proposed methods are adequate to support project objectives. Some of the sampling results will be used to determine if contaminant levels are hazardous to human health and/or the environment (SWMU 2b,c,d)). However, these hazardous levels are not included in the Addendum. The method sensitivity must be compared to these levels to determine if the appropriate analytical method has been selected.

Page 2

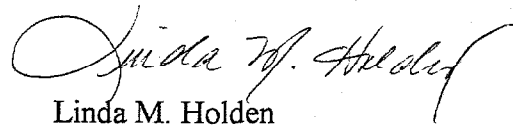
Mr. James F. Harris

Subj: Additional Comments on the Amended Project Plans Sampling for the Phase III RFI for the NAS Oceana (7/97)

2. The SWMU 18 confirmation sampling activities will determine if excavation efforts sufficiently removed Polynuclear Aromatic Hydrocarbons (PAHs). However, the clean up goals are not included in the Addendum. The clean up goal will drive the method selection.
3. The analytical method references must include the reference for the preparation methods.

If you have any questions, please do not hesitate to contact me at (215) 566-3428.

Sincerely,



Linda M. Holden
Remedial Project Manager
RCRA Operations Branch

cc: Robert E. Greaves, 3HW90
Elizabeth Quinn, 3HW70
Jack Hwang, 3HW70
Russel McAvoy, VADEQ
Will Bullard, Department of Navy
N. M. Johnson, Department of Navy
Jack Robinson, CH2M Hill